

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

TODD COYER, KARL KISNER,
LAURYN OVERBEY, LISA SOLOMON,
and SONNY PIKE, Individually and as
representatives of a class of similarly situated
persons, on behalf of the UNIVAR
SOLUTIONS 401(K) PLAN f/k/a the
UNIVAR USA INC. VALUED
INVESTMENT PLAN

Plaintiffs,

v.

UNIVAR SOLUTIONS USA INC., THE
BOARD OF DIRECTORS OF UNIVAR
SOLUTIONS USA INC., THE
RETIREMENT PLAN COMMITTEE OF
UNIVAR SOLUTIONS USA INC.; and
DOES No. 1-20, Whose Names are Currently
Unknown,

Defendants.

Case No. 1:22-CV-0362

JOINT STATUS REPORT

Plaintiffs, Todd Coyer, Karl Kisner, Laurn Overbey, Lisa Solomon, and Sonny Pike
(collectively, “Plaintiffs”), and Defendants, Univar Solutions USA Inc., the Board of Directors
of Univar Solutions USA Inc., and the Retirement Plan Committee of Univar Solutions USA Inc.
(collectively, “Defendants”), by and through their respective counsel, jointly submit the
following Joint Status Report.

A. Progress Made on Written Discovery

With the exception of the Parties' disagreement as to the relevant time period for discovery, as noted in Plaintiffs' Motion to Compel submitted on July 14, 2023, the Parties represent that they have completed their production of documents. Plaintiffs' Motion to Compel documents covering the disputed time period remains pending. Plaintiffs are in the process of taking third-party discovery.

B. Depositions

Defendants have taken the depositions of all named Plaintiffs. Plaintiffs have deposed two of Defendants' witnesses. The Parties believe that they can complete the majority of the remaining depositions by the end of January. However, it is Plaintiffs' position that the pending Motion to Compel must be resolved before the depositions of Univar's Rule 30(b)(6) witness, the Plan's investment advisor, and the Plan's recordkeeper may be scheduled. Defendants maintain their position that the Parties are entitled to no more than ten depositions without leave of the Court.

Dated: November 16, 2023

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